

From: [Ed Nam](#)
To: [Antonio Fernandez](#); [Brian Nelson](#)
Cc: [Tad Wyso](#); [Roberts French](#)
Subject: Re: EPA - Honda Follow-up to 7/14 Meeting - AC Credits Discussion
Date: 07/20/2009 02:17 PM

Brian, Tony,

There are some good questions in here. Please think about some of these issues. Rob there are some in here that we might need to address together.

thanks
-Ed

▼ Robert Bienenfeld---07/20/2009 01:32:54 PM---Ed: Thank you very much for taking the time to meet with us last week. We hope

From: Robert_Bienenfeld@ahm.honda.com
To: Ed Nam/AA/USEPA/US@EPA
Cc: Brian Nelson/AA/USEPA/US@EPA, Antonio Fernandez/AA/USEPA/US@EPA
Date: 07/20/2009 01:32 PM
Subject: EPA - Honda Follow-up to 7/14 Meeting - AC Credits Discussion

Ed:

Thank you very much for taking the time to meet with us last week. We hope you found the exchange as valuable as we did. As we reviewed our discussion, and Honda's next steps, we realized we have a few more questions that we want to get your feedback on first. As you requested, we are now studying both the ANPRM Appendix, and the Idle Test. In preparation to study the Idle Test, we have the following questions:

1. The test says to set the AC Temp @ 9°F below the test cell temperature. What is the flexibility of the test cell temperature? Is this an opportunity for gaming?
2. How does the EPA-Proposed Idle Test consider Idle-Stop concepts like hybrids and ISG systems?
3. What about eco-modes? Eco-modes, in the Insight, for example, reduce AC load to improve FE. Currently, NHTSA allows FE testing with eco-modes averaged into the test results.
4. Your test states that manual ACs should set their systems to Max AC, "with no recirculation." Most "Max AC" modes do not allow their systems to remain on Max while manually defeating the recirculation requirement.
5. Are there other ways that EPA has been updating its thinking about the idle test that might be informative and helpful?
6. EPA requests that the data be reported in CO2 grams/min/cubic foot. How does EPA plan to use the cubic foot data?
7. Does EPA have an image of how the Idle Test could lead to an

Indirect
AC Credit calculation?

You might be interested in some of the issues we plan to explore in our Idle Test study/research. If you have some opinion/thought about these

research issues, we would very much like to hear from you before we commit resources towards their study :

a) Does the EPA-Proposed Idle Test unfairly penalize an OEM who has worked hard to minimize friction at idle? The theory being tested here is that while the absolute AC load may be the same for two given OEMs, the AC load as a percent of the non-AC idling work might be much higher among one OEM compared to another.

b) Does the EPA-Proposed Idle Test unfairly penalize scroll-type compressors vs piston-type compressors? The working theory here is that piston-type compressors have their optimal efficiency at idle, and higher RPMs are relatively less efficient, while scroll-type compressors have their optimal efficiency at higher rpms.

Your prompt thoughts and response on these issues will greatly aid in our analysis and consideration of the EPA-Proposed Idle Test.

Robert

Robert Bienenfeld
Senior Manager,
Environment and Energy Strategy
Product Regulatory Office
American Honda Motor Co., Inc.
310.783.3056

From: [Robin Moran](#)
To: [Brian Nelson](#); [Antonio Fernandez](#); [Roberts French](#); [Christopher Lieske](#)
Cc: [William Charmley](#); [Ed Nam](#); [Linc Wehrly](#)
Subject: Honda issues
Date: 11/11/2009 09:29 PM

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Subject: Re: Honda issues
Date: 11/12/2009 10:26 AM
Attachments: [Internal EPA Document - Honda Questions from Nov 10, 2009.doc](#)

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From: [Roberts French](#)
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Cc: [Antonio Fernandez](#); [Brian Nelson](#); [Christopher Lieske](#); [Ed Nam](#); [Linc Wehrly](#); [William Charmley](#)
Subject: Re: Honda issues
Date: 11/12/2009 12:33 PM

#3

b) VMT application to LDT1: For early credits (MY09-MY11), VMT for PC is applied to PC and LDT1, and for the regular credits (MY12+) VMT for PC is applied to PC only. Is this your intent?

Yes. For early CA-based credit options we are using the CA fleet definitions, but chose to not tinker with the VMT figures. There are so few LDT1s that we reasoned that it really wasn't going to make a huge difference, and the program is far less complex by taking this approach.

c) Dual Fuel Vehicles: Is EPA considering PHEVs as "dual fuel vehicles." Dual fuel vehicles have a phased-out credit (by 2020). If PHEVs are not considered "Dual Fuel" vehicles, then how do you plan to treat them?

Yes, we are treating them as dual-fuel vehicles, at least with respect to cert and labeling. However, under EPCA CAFE requirements, a dual fuel vehicle where electricity is the alternative fuel has to be able to drive the city cycle and the highway cycle on electricity if it is to be considered a dual fuel vehicle. I'm not 100% sure of how NHTSA will calculate MPG for these, but I know the two options. Our regs do not address dual fuel vehicles except for alcohol and gaseous alternative fuels, and extension of our approach regarding FFVs to PHEVs needs to be discussed. Our regs do not include a credit for all dual fuel vehicles, although the statute does, so we will need to interpret how to calculate such a credit.

#4(k)

Not sure what the footprint calculation inconsistency is, without more explanation. When people speak of "footprint calculation" they are often speaking about one of two things: either the calculation of the actual footprint in square feet of a given vehicle, or the calculation of the footprint-based standard. Without more detail I don't know which, although I don't think there should be an inconsistency in the former, and we tried to be consistent but more detailed/thorough in the latter. I'll be interested in hearing what they have to say.

Roberts W. French, Jr.
U.S. EPA Office of Transportation and Air Quality
Compliance and Innovative Strategies Division
2000 Traverwood Drive
Ann Arbor, MI 48105
Phone: 734.214.4380 Fax: 734.214.4869 Email: french.roberts@epa.gov

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Cc: [Antonio Fernandez](#); [Brian Nelson](#); [Christopher Lieske](#); [Ed Nam](#); [Linc Wehrly](#); [Roberts French](#)
Subject: Re: Honda issues
Date: 11/13/2009 09:02 AM

Robin

Will we have any of our AC experts at the Honda meeting?

▼ [William Charmley](#)

----- Original Message -----

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Sent: 11/12/2009 10:26 AM EST
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[attachment "Internal EPA Document - Honda Questions from Nov 10, 2009.doc" deleted by William Charmley/AA/USEPA/US]

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From: [Robin Moran](#)
To: [Linc Wehrly](#); [Roberts French](#); [Chris Nevers](#)
Subject: Honda question on PHEV EAER
Date: 11/13/2009 09:49 AM

Honda asks this question on the GHG proposal -- do any of you have thoughts?

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- h) Truck Strake: This is an enforcement/interpretation issue. Strakes improve F/E, but can disqualify the vehicle from the Truck category.
- i) Off-Cycle Credits: Honda will propose some qualification and testing changes.
- j) PHEV 75% Useful Life Indicator: This is "on the books" at EPA since 2001, however the Preamble indicates no intention to have GHG OBD at this time.
- k) Footprint Calculation differences between EPA and NHTSA: we will explain this problem and propose to use EPA's calculation.

Robert Bienenfeld
Senior Manager,
Environment and Energy Strategy
Product Regulatory Office
American Honda Motor Co., Inc.
310.783.3056

From: [Chris Nevers](#)
To: [Robin Moran](#)
Cc: [Linc Wehrly](#); [Roberts French](#)
Subject: Re: Honda question on PHEV EAER
Date: 11/13/2009 01:03 PM

Unless we incorporate some use of Equivalent All Electric Range in the label, we have no use for it. If we used an EAER, I would not want to be boxed in by ARB. Unlike ARB, we could be held to adjusting EAER via 5-cycle adjustment or some future adjustment.

Chris

▼ Robin Moran---11/13/2009 09:49:57 AM---Honda asks this question on the GHG proposal -- do any of you have thoughts? e) PHEV EAER: ARB us

From: Robin Moran/AA/USEPA/US
To: Linc Wehrly/AA/USEPA/US@EPA, Roberts French/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA
Date: 11/13/2009 09:49 AM
Subject: Honda question on PHEV EAER

Honda asks this question on the GHG proposal -- do any of you have thoughts?

e) PHEV EAER: ARB uses RcdA during FTP. EPA does not have a specific description of EAER. Honda proposes that EPA use ARB's definition.

----- Forwarded by Robin Moran/AA/USEPA/US on 11/13/2009 09:48 AM -----

From: Robert_Bienenfeld@ahm.honda.com
To: William Charmley/AA/USEPA/US@EPA, Robin Moran/AA/USEPA/US@EPA, Ed Nam/AA/USEPA/US@EPA, steve.wood@dot.gov, rebecca.yoon@dot.gov
Cc: masaki_yamaguchi@ahm.honda.com, Ichiro_Sakai@ahm.honda.com, Tetsuro_Sekikawa%HRDJP@ahm.honda.com
Date: 11/10/2009 09:06 PM
Subject: Draft Memo

Bill, Robin, Ed, Stephen, Rebecca:

Thanks, again for planning to meet with us on Friday, November 13th, from 10am EST in Ann Arbor.

- #1. Request: We would like to see if we can extend the meeting from 10am - 11:30am to 10am - 12pm. We think this will enable us to get through our issues.
- #2. FYI: We are planning to meet with Lucie Audette to discuss

label
issues from 9am - 10am

#3. We have several, minor issues that we would like to ask in advance of our meeting, that we do not plan to discuss, unless time permits:

- a) A/C Idle Test: There is no description of fan speed for manual AC systems in the idle test description. Honda assumes the condition of the fan speed should be set to "Max." Is this correct? Will you clarify in the regulation?
 - b) VMT application to LDT1: For early credits (MY09-MY11), VMT for PC is applied to PC and LDT1, and for the regular credits (MY12+) VMT for PC is applied to PC only. Is this your intent?
 - c) Dual Fuel Vehicles: Is EPA considering PHEVs as "dual fuel vehicles." Dual fuel vehicles have a phased-out credit (by 2020). If PHEVs are not considered "Dual Fuel" vehicles, then how do you plan to treat them?
 - d) A/C Credits: There seems to be an inconsistency between two references:
 - In 40CFR1866-12(c)(1): A/C credits are conditioned on an improvement of 10% "when compared to previous design"
 - In 40CFR1866-12(c)(6): A/C credits are conditioned on 10% improvement "when compared to a system using standard, or prior model year" designsWhich is correct? Honda thinks it should be based on "previous or standard design" not "prior model year" design.
 - e) PHEV EAER: ARB uses Rcda during FTP. EPA does not have a specific description of EAER. Honda proposes that EPA use ARB's definition.
- #4. During our visit, Honda proposes the following agenda items:
- a) Zero grams/mile for EV, PHEV and FCEV. Honda would like to review EPA's thinking
 - b) Super Credits: Honda will propose a formula
 - c) FFV Credits: Honda will request that one vehicle can earn FFV credits for the entire fleet, not just car FFV credits or truck FFV credits.
 - d) Downsizing Issue: Honda will propose a value for Truck cap that is different from the 41 square foot car cap.
 - e) N2O & CH4 Issue: Honda will propose change the "cap" to a "default" and use the CO2e approach
 - f) In Use Standard: Honda will discuss the challenges and make a proposal
 - g) A/C Credit Issues: Honda will propose modifying the 14.9 grams/minute qualifying requirement, and propose an alternative COP improvement pathway.
 - h) Truck Strake: This is an enforcement/interpretation issue. Strakes improve F/E, but can disqualify the vehicle from the Truck category.
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OBD at
this time.
k) Footprint Calculation differences between EPA and NHTSA:
we will
explain this problem and propose to use EPA's calculation.

Robert Bienenfeld
Senior Manager,
Environment and Energy Strategy
Product Regulatory Office
American Honda Motor Co., Inc.
310.783.3056

From: [Robin Moran](#)
To: [Linc Wehrly](#); [Janet Cohen](#); [Roberts French](#)
Subject: Honda presentation
Date: 11/18/2009 03:27 PM
Attachments: [EPA NHTSA Single National Standard Meeting Docs v4.pdf](#)

Here's Honda's slides from last Friday. Linc, when you have some time to digest the in-use, other cert comments, let's discuss your thoughts.

Robin

----- Forwarded by Robin Moran/AA/USEPA/US on 11/18/2009 03:13 PM -----

From: Robert_Bienenfeld@ahm.honda.com
To: William Charmley/AA/USEPA/US@EPA, Robin Moran/AA/USEPA/US@EPA, "Stephen P. Wood" <steve.wood@dot.gov>, "Rebecca S. Yoon" <rebecca.yoon@dot.gov>
Date: 11/13/2009 01:03 PM
Subject: Today's presentation

Thanks, again for the meeting, today. Here is the document we shared with you - it is OK, no redactions necessary.
Robert

Robert Bienenfeld
Office: 310-783-3056
Mobile: 310-948-2569

----- Original Message -----
From: Robert Bienenfeld
Sent: 11/13/2009 07:17 AM PST
To: phillip.gorney@dot.gov
Cc: Tommy Chang
Subject: Draft Version
(See attached file: EPA NHTSA Single National Standard Meeting Docs v4.pdf)

Robert Bienenfeld
Senior Manager,
Environment and Energy Strategy
Product Regulatory Office
American Honda Motor Co., Inc.



310.783.3056 EPA NHTSA Single National Standard Meeting Docs v4.pdf

From: Peter_Meier@ahm.honda.com
To: [Roberts French/AA/USEPA/US@EPA](mailto:Roberts_French/AA/USEPA/US@EPA); [David Good/AA/USEPA/US@EPA](mailto:David_Good/AA/USEPA/US@EPA)
Cc: [Joel Ball/AA/USEPA/US@EPA](mailto:Joel_Ball/AA/USEPA/US@EPA); [Darin Johnson@ahm.honda.com](mailto:Darin_Johnson@ahm.honda.com); [masaki yamaguchi@ahm.honda.com](mailto:masaki_yamaguchi@ahm.honda.com)
Subject: Honda - Fw: GHG questions
Date: 04/14/2011 03:01 PM
Attachments: [Alliance GHG Implementation Questions for EPA Sep 23 2010 Work Shop.doc](#)

Hello Rob and Dave,

I'm following up on an old document that the Alliance shared with AIAM (now Global Automakers). They had a list of 18 questions (below). We were wondering if EPA responded to any or all of these, and if so, could you share your responses? Of course if you can offer any other information that would be appreciated as well.

Thank you,

Pete Meier, American Honda Certification
(310) 783-3424

----- Forwarded by Peter Meier/AHM/AM/HONDA on 04/14/2011 11:54 AM -----

John Cabaniss <jcabaniss@aiam.org> on 12/11/2010 07:06:32 AM

To: "Park, J. S. (Kia)" <jspark@kiausa.com>, "Alden, Jack (Honda)" <jack_alden@ahm.honda.com>, "Alsip, Bob (Suzuki)" <balsip@suz.com>, "Amato, Ragiemra (Delphi)" <ragiemra.amato@delphi.com>, Annemarie Pender <apender@aiam.org>, "Arima, Yuichi (Honda)" <yuichi_arima@hm.honda.co.jp>, "Azuma, Shinya (Honda)" <shinya_azuma@hm.honda.co.jp>, "Babcock, Bob (Hyundai)" <rbabcock@hatci.com>, "Bacon, Ian (McLaren)" <ian.bacon@mcclaren.com>, "Bakker, Debbie (Hyundai)" <dbakker@hatci.com>, "Banowetz, Roger (Subaru)" <BanowetzR@Subaru-research-ca.com>, "Barker, David (Hyundai-Kia)" <dbarker@hatci.com>, "Barnes, Duke (Nissan)" <duke.barnes@nissan-usa.com>, "Bienenfeld, Robert (Honda)" <robert.bienenfeld@ahm.honda.com>, "Bookbinder, Ron (JAMA)" <rbookbinder@jama.org>, "Brillhart, Ember (Honda)" <Ember_Brillhart@hna.honda.com>, "Brune, Ed (Peugeot)" <ed.brune@psaust.com>, "Buma, Keiichi (Denso)" <buma@ead.denso.co.jp>, "Bush, Ken (Suzuki)" <kbush@suz.com>, Caitlin Baier <CBaier@aiam.org>, "Cardno, Robert (Denso)" <ROBERT_CARDNO@denso-diam.com>, "Caruso, Michael L. (Bosch)" <michael.caruso@us.bosch.com>, "Cattellani, Mauro (Maserati)" <mcattellani@maserati.it>, "Cavanaugh, Timothy (Bosch)" <timothy.cavanaugh@us.bosch.com>, "Cavicchioli, Elisa (Ferrari)" <ecavicchioli@ferrari.it>, "Cayetano, Garcia (Bosch)" <Cayetano.Garcia@us.bosch.com>, "Chang, Tommy (Honda)" <tommy_chang@ahm.honda.com>, "Cingi, Corrado (Ferrari)" <ccingi@ferrari.it>, "Cohen, Ed (Honda)" <edward.cohen@hna.honda.com>, "Coss, Ray (Nissan)" <Ray.Coss@nmm.nissan-usa.com>, "Crafard, Scott (Isuzu)" <Scott.Crafard@isza.com>, "DeAscentiis, Brian (Subaru)" <bdea@SUBARU.com>, "Deshpande, Sanjay (Mahindra)" <DESHPANDE.SANJAY3@mahindra.com>, Di Pagnotti <dpagnotti@aiam.org>, "Doku, Dan (Maserati)" <ddoku@maseratiusa.com>, "Duncan, Bill (JAMA)" <wd@jama.org>, "Eccleston, James (Aston Martin)" <jecclest@astonmartin.com>, "Edwards, Ken (Denso)" <kenneth.edwards@denso-diam.com>, Ellen Gleberman <egleberman@aiam.org>, "Eum, Harry (Hyundai)" <hseum@hyundai.com>, "Feygin, George (Nissan)" <george.feygin@nissan-usa.com>, "Fields, Sandy (Nissan)" <FieldsS@NRD.Nissan-usa.com>, "Gibbons, John (Nissan)" <john.gibbons@nissan-usa.com>, "Gloddeck, Al (Nissan)" <alfred.gloddeck@nissan-usa.com>, "Grieb, Gary (Delphi)" <gary.r.grieb@delphi.com>, "Gutierrez, Jolene (Honda)" <jolene.gutierrez@ahm.honda.com>, "Hernandez, Luis (Suzuki)" <luis.hernandez@suz.com>, "Hiple, Sarah (Nissan)" <sarah.hiple@nissan-usa.com>, Jill Pokorney <jpokorney@aiam.org>, John Cabaniss <jcabaniss@aiam.org>, "John Frooshani (Subaru)" <jfrooshani@SUBARU.com>, "Johnson, Darin (Honda)" <Darin_Johnson@ahm.honda.com>, "Johnson, Steve (Hyundai)" <sjohnson@hmausa.com>, "Kardos, Dale" <dale.kardos@motorvehiclereg.com>, "Khan, Farrukh (Nissan)" <KhanF@NRD.Nissan-usa.com>, "Kim, Jacquelyn (Hyundai)" <JacquelynKim@hmausa.com>, "Kondo, Ken (Suzuki)" <kentaro.kondo@suz.com>, "Koseki, Takahiro (Isuzu)" <Takahiro_Koseki@notes.isuzu.co.jp>, "Lawler, Tim (Bosch)" <tim.lawler@us.bosch.com>, "Lim, Scott (Hyundai)" <s.c.lim@hyundai.com>, "Lock, Allen (Denso)" <allen.lock@denso-diam.com>, "Lucki, Richard (Peugeot)" <richard.lucki@psaust.com>, "MacLeod, Bill (Hyundai-Kia)" <bmacleod@hatci.com>, "Maeda, Masahiko (Honda)" <masahiko_a.maeda@hm.honda.co.jp>, "Marsee, Jeff (Isuzu)" <jeff.marsee@isza.com>, "Masahiro, Inden (ADVICS)" <minder@advics-na.com>, "Matthias, Tappe (Bosch)" <Matthias.Tappe@de.bosch.com>, "Meier, Peter (Honda)" <Peter_Meier@ahm.honda.com>, Mike Stanton <mstanton@aiam.org>, "MohanFaj, Nataraj (Mahindra)" <NATARAJAN.MOHANRAJ@mahindra.com>, "Morales, Alex (Hyundai)" <amorales@hmausa.com>, "Nakamura-Newbraugh, Yasumi (Nissan)" <yasumi.nakamura-newbraugh@nissan-usa.com>, "Neff, Donald (Nissan)" <donald.neff@nissan-usa.com>, "Nott, Tammy (Hyundai)"

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cc: Robert Maxwell <remaxwell@comcast.net>
 Subject: FW: GHG questions

To: AIAM Environment & Energy Subcommittee
 Re: Certification - GHG - Alliance Questions Submitted to EPA

Attached in the email below and in the attached Word document are follow up questions on GHG certification submitted by the Alliance to EPA after the EPA September workshop. EPA is preparing answers to these and other questions submitted by industry.

Regards.

John Cabaniss

We have moved! As of December 13, my new contact information is:

John M. Cabaniss, Jr.
 Director, Environment & Energy
 Association of International Automobile Manufacturers, Inc.
 1050 K Street, NW Suite 650
 Washington, DC 20001
 202.650.5562 (direct)
 202.650.5555 (main)

Please note that AIAM will have limited phone/fax/email access from noon on Friday December 10 through Monday, December 13.

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From: Giedrius Ambrozaitis [mailto:gambrozaitis@autoalliance.org]
 Sent: Thursday, December 09, 2010 3:16 PM
 To: John Cabaniss
 Subject: RE: GHG questions

John -
 We submitted the attached and then followed up with the following:

Giedrius
 Alliance of Automobile Manufacturers
 (248) 915-8836

From: Giedrius Ambrozaitis
 Sent: Monday, October 04, 2010 10:15 AM
 To: Wehrly.Linc@epamail.epa.gov
 Subject: RE: GHG Questions

Dear Linc -

Thank you for holding the informative GHG Rule Implementation workshop on Sept 23 and for Dave Good's Sept 28 followup email pointing out sales tracking should follow NLEV (as per the GHG rule preamble). We had submitted some questions and several were answered, thank you again, and several, we agree, are not yet ripe for asking (N2O and A/C Idle testing), but several were not answered or the answers given conflict with

answers given in another part of the presentation.
So, using our original questions doc (attached), here is a new list:
Alliance questions answered: 1, 2, 3, 4, 5 (we note on this question that is very important for manufacturers to receive the list of changes to VERIFY data inputs as soon as possible to be able to efficiently implement the necessary IT changes) , 6, 8, 15
Alliance questions we agree are too early to answer now: 10, 11, 16
Alliance questions that we would still like answered: 9, 12, 13, 14, 18
EPA answers that conflict: Alliance questions 7 and 17 :
Question 7: EPA answered this on slide 68, bullet 3, subbullet 1--
"Engineering evaluation required in Part I for CO2, CH4, N2O: Common calibration approaches are used at high altitudes." However, since EPA already requires compliance with emission standard at altitude, there is no need for a further compliance statement that the calibration approaches are the same at high altitude as at low altitude. Indeed, the opposite may be true to ensure compliance with emission standard at high altitude. We recommend this subbullet be deleted.
Question 17: In order to align with CAFE, GHG compliance must be tracked via production data too, not via sales data. As Dave Good correctly points out in his Sep 28 email, the GHG rule preamble states that tracking is to be performed as it was in the NLEV rule, using "point of first sale", which is essentially the same as production data (with some slight inconsistencies for emergency vehicles and territories noted below). However, the actual GHG rule regulatory language and the slides from the Sep 23 workshop (slide 45 bullet 2) don't agree with that preamble language. 86.1867-12(a)(1)(iii)(A) states that "Total U.S. model year sales data will be used, instead of production data;" however, the introductory paragraph to 86.1867-12 states that "The terms 'sales' and 'sold' as used in this section shall mean vehicles produced and delivered for sale in the states and territories of the United States." Since EPA defined "sales" and "sold" in the introductory paragraph, the contradictory and confusing phrase "instead of production data" should be deleted from paragraph 86.1867-12(a)(1)(iii)(A).
Even though the use of NLEV sales tracking method is close to the same as using production numbers, it is not exactly the same. This introduces certain inconsistencies with CAFE's true production number tracking, for instance, with sales to territories that are in GHG but not CAFE, and with the tracking of emergency vehicle sales. Extra territories that are in GHG but not in CAFE, such as Guam, need to be excluded from the reporting requirements, and the use of production data would accomplish this. For emergency vehicles, EPA stated on Sep 23 slide 14 that they're including emergency vehicles but then stated on Sep 23 slide 16 that the minimum testing requirements are the same as for CAFE so it "assures that the same data set will be used for both GHG & CAFE". Actually, it doesn't do that because police units will have tests for GHG that aren't used in CAFE. Although NLEV method is an acceptable method, we continue to recommend that GHG use exactly the same tracking as in CAFE, namely, production numbers. EPA needs to be aware of the inconsistencies to make the VERIFY file formats compatible with this distinction, or preferably, allow manufacturers to report GHG for only the CAFE volumes plus emergency vehicles.
Totally new Alliance Question:
19. Regarding the 5cycle FE label rule's limitation of applicability of the 90 days rule (referring to the use of manufacturer tests for the litmus test instead of EPA confirmatory tests) only to MY2011. We have heard that in some special emergency cases, EPA would consider extending the rule also to past MY2011 vehicles. Can EPA clarify under what circumstance EPA would consider as an emergency situation and would consider special treatment on a case-by-case issue?

Regards,
Giedrius
Alliance of Automobile Manufacturers
(248) 915-8836

From: John Cabaniss [jcabaniss@aiam.org]
Sent: Wednesday, December 08, 2010 4:09 PM
To: Giedrius Ambrozaitis
Subject: GHG questions
Giedrius,

I understand the Alliance has submitted a lengthy list of GHG certification questions to EPA. Could you share your list?

Thanks.

John

As of December 13, my new contact information is:

John M. Cabaniss, Jr.
Director, Environment & Energy
Association of International Automobile Manufacturers, Inc.
1050 K Street, NW Suite 650
Washington, DC 20001
202.650.5562 (direct)
202.650.5555 (main)

Please note that AIAM will have limited phone/fax/email access from noon on Friday December 10 through Monday, December 13.

This e-mail is intended for the sole and exclusive use of AIAM, its member companies and their employees. Distribution or forwarding of these materials to any other person or entity is strictly prohibited, absent prior consent of AIAM.

(See attached file: Alliance GHG Implementation Questions for EPA Sep 23 2010 Work Shop.doc)

From: [David Good](#)
To: Peter_Meier@ahm.honda.com
Cc: Darin_Johnson@ahm.honda.com; [Joel Ball](#); masaki_yamaguchi@ahm.honda.com; [Roberts French](#)
Subject: Re: Honda - Fw: GHG questions
Date: 04/14/2011 04:56 PM
Attachments: [Alliance GHG Implementation Questions for EPA Sep 23 2010 Work Shop.doc](#)

Pete,

EPA hasn't officially responded to the Alliance's questions. They subsequently modified their list---since some of the questions were answered in the 9/23/10 GHG workshop, etc.

I can go over EPA's DRAFT responses to their questions any time next week.

I'm out on Fri (4/15) back on Monday (4/18/11).

Dave

▼ Peter_Meier---04/14/2011 03:01:03 PM---Hello Rob and Dave, I'm following up on an old document that the Alliance shared with AIAM (now

From: Peter_Meier@ahm.honda.com
To: Roberts French/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA
Cc: Joel Ball/AA/USEPA/US@EPA, Darin_Johnson@ahm.honda.com, masaki_yamaguchi@ahm.honda.com
Date: 04/14/2011 03:01 PM
Subject: Honda - Fw: GHG questions

Hello Rob and Dave,

I'm following up on an old document that the Alliance shared with AIAM (now Global Automakers). They had a list of 18 questions (below). We were wondering if EPA responded to any or all of these, and if so, could you share your responses? Of course if you can offer any other information that would be appreciated as well.

Thank you,

Pete Meier, American Honda Certification
(310) 783-3424

----- Forwarded by Peter Meier/AHM/AM/HONDA on 04/14/2011 11:54 AM -----

John Cabaniss <jcabaniss@aiaam.org> on 12/11/2010 07:06:32 AM

To: "Park, J. S. (Kia)" <jspark@kiausa.com>, "Alden, Jack (Honda)" <jack_alden@ahm.honda.com>, "Alsip, Bob (Suzuki)" <balsip@suz.com>,

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 <jie.zeng@denso-diam.com>

cc: Robert Maxwell <remaxwell@comcast.net>

Subject: FW: GHG questions

To: AIAM Environment & Energy Subcommittee

Re: Certification - GHG - Alliance Questions Submitted to
 EPA

Attached in the email below and in the attached Word document are follow up questions on GHG certification submitted by the Alliance to EPA after the EPA September workshop. EPA is preparing answers to these and other questions submitted by industry.

Regards.

John Cabaniss

We have moved! As of December 13, my new contact information is:

John M. Cabaniss, Jr.
Director, Environment & Energy
Association of International Automobile Manufacturers, Inc.
1050 K Street, NW Suite 650
Washington, DC 20001
202.650.5562 (direct)
202.650.5555 (main)

Please note that AIAM will have limited phone/fax/email access from noon on Friday December 10 through Monday, December 13.

This e-mail is intended for the sole and exclusive use of AIAM, its member companies and their employees. Distribution or forwarding of these materials to any other person or entity is strictly prohibited, absent prior consent of AIAM.

From: Giedrius Ambrozaitis [mailto:gambrozaitis@autoalliance.org]
Sent: Thursday, December 09, 2010 3:16 PM
To: John Cabaniss
Subject: RE: GHG questions

John -
We submitted the attached and then followed up with the following:

Giedrius
Alliance of Automobile Manufacturers
(248) 915-8836

From: Giedrius Ambrozaitis
Sent: Monday, October 04, 2010 10:15 AM
To: Wehrly.Linc@epamail.epa.gov
Subject: RE: GHG Questions
Dear Linc -
Thank you for holding the informative GHG Rule Implementation workshop on Sept 23 and for Dave Good's Sept 28 followup email pointing out sales tracking should follow NLEV (as per the GHG rule preamble). We had submitted some questions and several were answered, thank you again, and several, we agree, are not yet ripe for asking (N2O and A/C Idle testing), but several were not answered or the answers given conflict with answers given in another part of the presentation. So, using our original questions doc (attached), here is a new list:
Alliance questions answered: 1, 2, 3, 4, 5 (we note on this question that is very important for manufacturers to receive the list of changes to VERIFY data inputs as soon as possible to be able to efficiently implement the necessary IT changes) , 6, 8, 15

Alliance questions we agree are too early to answer now: 10, 11, 16
Alliance questions that we would still like answered: 9, 12, 13, 14, 18
EPA answers that conflict: Alliance questions 7 and 17 :
Question 7: EPA answered this on slide 68, bullet 3, subbullet 1-
-
"Engineering evaluation required in Part I for CO2, CH4, N2O:
Common
calibration approaches are used at high altitudes." However,
since EPA
already requires compliance with emission standard at altitude,
there is no
need for a further compliance statement that the calibration
approaches are
the same at high altitude as at low altitude. Indeed, the
opposite may be
true to ensure compliance with emission standard at high
altitude. We
recommend this subbullet be deleted.
Question 17: In order to align with CAFE, GHG compliance must be
tracked
via production data too, not via sales data. As Dave Good
correctly points
out in his Sep 28 email, the GHG rule preamble states that
tracking is to
be performed as it was in the NLEV rule, using "point of first
sale", which
is essentially the same as production data (with some slight
inconsistencies for emergency vehicles and territories noted
below).
However, the actual GHG rule regulatory language and the slides
from the
Sep 23 workshop (slide 45 bullet 2) don't agree with that
preamble
language. 86.1867-12(a)(1)(iii)(A) states that "Total U.S. model
year sales
data will be used, instead of production data;" however, the
introductory
paragraph to 86.1867-12 states that "The terms 'sales' and 'sold'
as used
in this section shall mean vehicles produced and delivered for
sale in the
states and territories of the United States." Since EPA defined
"sales" and
"sold" in the introductory paragraph, the contradictory and
confusing
phrase "instead of production data" should be deleted from
paragraph
86.1867-12(a)(1)(iii)(A).
Even though the use of NLEV sales tracking method is close to the
same as
using production numbers, it is not exactly the same. This
introduces
certain inconsistencies with CAFE's true production number
tracking, for
instance, with sales to territories that are in GHG but not CAFE,
and with
the tracking of emergency vehicle sales. Extra territories that
are in GHG
but not in CAFE, such as Guam, need to be excluded from the
reporting
requirements, and the use of production data would accomplish
this. For
emergency vehicles, EPA stated on Sep 23 slide 14 that they're
including
emergency vehicles but then stated on Sep 23 slide 16 that the
minimum
testing requirements are the same as for CAFE so it "assures that
the same
data set will be used for both GHG & CAFE". Actually, it doesn't
do that
because police units will have tests for GHG that aren't used in
CAFE.
Although NLEV method is an acceptable method, we continue to

recommend that
GHG use exactly the same tracking as in CAFE, namely, production
numbers.
EPA needs to be aware of the inconsistencies to make the VERIFY
file
formats compatible with this distinction, or preferably, allow
manufacturers to report GHG for only the CAFE volumes plus
emergency
vehicles.

Totally new Alliance Question:

19. Regarding the 5cycle FE label rule's limitation of
applicability of
the 90 days rule (referring to the use of manufacturer tests for
the litmus
test instead of EPA confirmatory tests) only to MY2011. We have
heard that
in some special emergency cases, EPA would consider extending the
rule also
to past MY2011 vehicles. Can EPA clarify under what circumstance
EPA would
consider as an emergency situation and would consider special
treatment on
a case-by-case issue?

Regards,
Giedrius
Alliance of Automobile Manufacturers
(248) 915-8836

From: John Cabaniss [jcabaniss@aiaam.org]
Sent: Wednesday, December 08, 2010 4:09 PM
To: Giedrius Ambrozaitis
Subject: GHG questions
Giedrius,

I understand the Alliance has submitted a lengthy list of GHG
certification
questions to EPA. Could you share your list?

Thanks.

John

As of December 13, my new contact information is:

John M. Cabaniss, Jr.
Director, Environment & Energy
Association of International Automobile Manufacturers, Inc.
1050 K Street, NW Suite 650
Washington, DC 20001
202.650.5562 (direct)
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absent
prior consent of AIAM.

(See attached file: Alliance GHG Implementation Questions for
EPA Sep 23
2010 Work Shop.doc)



Alliance GHG Implementation Questions for EPA Sep 23 2010 Work Shop.doc

From: [Robin Moran](#)
To: [Arvon Mitcham](#); [Roberts French](#); [Christopher Lieske](#)
Subject: Fw: Electric Heat Circulation Pump
Date: 04/12/2012 08:18 AM

Rob, I had already forwarded this to Arvon to consider, but thought you should see it too to see if it would work for the regs. Arvon/team will make a recommendation on the technical merits of course too.

----- Forwarded by Robin Moran/AA/USEPA/US on 04/12/2012 08:17 AM -----

From: Robert_Bienenfeld@ahm.honda.com
To: Ed Nam/AA/USEPA/US@EPA, Robin Moran/AA/USEPA/US@EPA
Cc: William Charmley/AA/USEPA/US@EPA
Date: 04/11/2012 06:42 PM
Subject: Electric Heat Circulation Pump

Ed, Robin:

At our Honda meeting to discuss off-cycle credits, you'll remember that Honda indicated we believe we can meet the functional performance criteria of the Electric Heat Circulation Pump without actually installing one. We proposed that the language be modified to allow the off-cycle credit for the performance you are after, regardless of whether or not an Electric Heat Circulation Pump is installed. Robin specifically asked for recommended language, so here are a few suggestions:

1. The definition could be modified to read something like this:
(B) Electric heater circulation pump means a pump or other system installed in a stop-start equipped vehicle or in a hybrid electric vehicle or plug-in hybrid electric vehicle. that continues to circulate hot coolant through the heater core when the engine is stopped during a stop-start event. This system must be calibrated to keep the engine off for 1 minute or more when the external ambient temperature is 30 deg F. An electric heater circulation pump continues to circulate hot coolant through the heater core when the engine is stopped during a stop-start event. Any other system which is installed that achieves the same functional performance of heating the cabin while the engine is off when the external temperature is 30 deg F would qualify for the same off-cycle credit as the Electric heater circulation pump.

rjb

Robert Bienenfeld
Senior Manager,
Environment and Energy Strategy
Product Regulatory Office
American Honda Motor Co., Inc.
310.783.3056

From: [Arvon Mitcham](#)
To: [Robin Moran](#)
Cc: [Christopher Lieske](#); [Roberts French](#)
Subject: Re: Fw: Electric Heat Circulation Pump
Date: 04/12/2012 08:46 AM

So, should we docket this message? Otherwise, I don't see how we can incorporate.

Let me know.

- Arvon L. Mitcham

▼ Robin Moran---04/12/2012 08:18:21 AM---Rob, I had already forwarded this to Arvon to consider, but thought you should see it too to see if

From: Robin Moran/AA/USEPA/US
To: Arvon Mitcham/AA/USEPA/US@EPA, Roberts French/AA/USEPA/US@EPA, Christopher Lieske/AA/USEPA/US@EPA
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Senior Manager,
Environment and Energy Strategy
Product Regulatory Office
American Honda Motor Co., Inc.
310.783.3056

From: [Robin Moran](#)
To: [Arvon Mitcham](#)
Cc: [Christopher Lieske](#); [Roberts French](#)
Subject: Re: Fw: Electric Heat Circulation Pump
Date: 04/12/2012 08:49 AM

Arvon, if we end up believing this approach has merit, then yes, we should go back and ask Robert if it is ok to docket.

▼ Arvon Mitcham---04/12/2012 08:46:06 AM---So, should we docket this message? Otherwise, I don't see how we can incorporate.

From: Arvon Mitcham/AA/USEPA/US
To: Robin Moran/AA/USEPA/US@EPA
Cc: Christopher Lieske/AA/USEPA/US@EPA, Roberts French/AA/USEPA/US@EPA
Date: 04/12/2012 08:46 AM
Subject: Re: Fw: Electric Heat Circulation Pump

So, should we docket this message? Otherwise, I don't see how we can incorporate.

Let me know.

- Arvon L. Mitcham

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Senior Manager,
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Product Regulatory Office
American Honda Motor Co., Inc.
310.783.3056

From: [Roberts French](#)
To: Peter_Meier@ahm.honda.com
Cc: Darin_Johnson@ahm.honda.com; [David Good](#); [Joel Dalton](#); [Robert Peavyhouse](#)
Subject: Re: Honda - Natural Gas CAFE/GHG Calculation
Date: 09/18/2012 04:43 PM
Attachments: [GHG-CAFE alt fuel treatment v2.pdf](#)

Pete,

I have attached a worksheet that I put together that helps sort out the CAFE and GHG treatment of dedicated and dual fuel alternative fuel vehicles. Of course this should not be regarded as having the same authority as the regulatory text, and should not be a substitute for the regulations, but I believe it accurately summarizes the regulatory provisions in a more visual manner.

As you can see, it is correct that the 0.15 divisor exists only in the GHG world through 2015. It does not persist after that for either dedicated or dual fuel vehicles.

For CAFE, the statute is very explicit about how CAFE should be calculated for dual fuel alternative fuel vehicles up to and including the 2019 model year. It is also fairly explicit about the CAFE treatment of dedicated vehicles up to and beyond the 2019 model year (until Congress makes some changes). Through 2019 the dual fuel CNG-gas vehicle CAFE is a 50/50 weighting of the two fuels, where CNG gets to use the 0.15 divisor. After 2019 the dual fuel CNG-gas vehicle CAFE is a UF-weighting of the two fuels, where the CNG gets to use the 0.15 divisor. Dedicated CNG vehicles may use the 0.15 into eternity, barring Congressional action that changes this. So yes, after 2019 dedicated vehicles may continue to use the 0.15 divisor.

As far as there being no cap for CAFE under the UF approach, that's not quite correct. Through 2019 the approach must be the 50/50 average of the two fuels, and the cap applies. After 2019, on the CAFE side of the equation, the concept of a cap on credits disappears, and the UF-based approach takes over.

On the GHG side of the equation, dual fuel CNG-gas vehicles have a choice through 2015: use the 50/50 weighting and the 0.15 divisor, in which case the CAFE-equivalent cap applies; or use the UF-based approach (no 0.15 divisor), in which as the CAFE-equivalent cap does not apply.

Clear as mud, right?

Rob



Roberts W. French, Jr.
U.S. EPA Office of Transportation and Air Quality
Compliance and Innovative Strategies Division
2000 Traverwood Drive
Ann Arbor, MI 48105
Phone: 734.214.4380 Fax: 734.214.4869 Email: french.roberts@epa.gov

▼ Peter_Meier---09/17/2012 08:33:54 PM---Hi Rob, I'm having a difficult time following how to calculate the CAFE mpg and GHG

From: Peter_Meier@ahm.honda.com
To: Roberts French/AA/USEPA/US@EPA
Cc: Joel Dalton/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Darin_Johnson@ahm.honda.com
Date: 09/17/2012 08:33 PM
Subject: Honda - Natural Gas CAFE/GHG Calculation

Hi Rob,

I'm having a difficult time following how to calculate the CAFE mpg and GHG fleet (CREE) for both dedicated and dual fuel CNG in the 2012-2025 timeframe. Honda is seriously considering expanding our future CNG offerings, and I'm not able to confidently answer questions regarding fleet calculations. I'm hoping you can help me understand the intent. I think the rules for when we can use the utility factor approach on dual fuel CNG are clear. Where I get lost is when we can apply the 0.15 factor.

It seems for CREE this 0.15 factor is never applied after 2015 for either dedicated nor dual fuel. Is this correct?

For CAFE it appears there's a change after 2019MY, where only the UF approach (2X range, ect..) may use the 0.15 factor. I guess that means dedicate may continue to use the 0.15 factor for CAFE throughout the 2012-2025 timeframe. Is that right?

The utility factor approach seems not count as a credit, and therefore there is no cap for CAFE if using this method. Is that right?

Any advise you can give would be greatly appreciated.

Thank you,

Pete Meier, American Honda Certification
(310) 783-3424
cell (310) 972-1501

From: [Peter Meier@ahm.honda.com](mailto:Peter_Meier@ahm.honda.com)
To: [Roberts French/AA/USEPA/US@EPA](mailto:Roberts_French/AA/USEPA/US@EPA)
Cc: [Joel Dalton/AA/USEPA/US@EPA](mailto:Joel_Dalton/AA/USEPA/US@EPA); [Darin Johnson@ahm.honda.com](mailto:Darin_Johnson@ahm.honda.com); [David Good/AA/USEPA/US@EPA](mailto:David_Good/AA/USEPA/US@EPA); [Robert Peavyhouse/AA/USEPA/US@EPA](mailto:Robert_Peavyhouse/AA/USEPA/US@EPA)
Subject: Re: Honda - Natural Gas CAFE/GHG Calculation
Date: 09/19/2012 12:43 AM

Hi Rob,

Thank you for the quick response. This is extremely helpful as we strive to understand the regulation, and is very much appreciated. I'm out of the office for a few days this week at the OBD Symposium, so I can't review it in detail with other Honda people yet. Although at first review it seems like exactly what we needed.

Thanks again,

Pete

From: Roberts French <French.Roberts@epamail.epa.gov>
To: Peter Meier@ahm.honda.com
Cc: Darin Johnson@ahm.honda.com, David Good <Good.David@epamail.epa.gov>, Joel Dalton <Dalton.Joel@epamail.epa.gov>, Robert Peavyhouse <Peavyhouse.Robert@epamail.epa.gov>
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Pete,

I have attached a worksheet that I put together that helps sort out the CAFE and GHG treatment of dedicated and dual fuel alternative fuel vehicles. Of course this should not be regarded as having the same authority as the regulatory text, and should not be a substitute for the regulations, but I believe it accurately summarizes the regulatory provisions in a more visual manner.

As you can see, it is correct that the 0.15 divisor exists only in the GHG world through 2015. It does not persist after that for either dedicated or dual fuel vehicles.

For CAFE, the statute is very explicit about how CAFE should be calculated for dual fuel alternative fuel vehicles up to and including the 2019 model year. It is also fairly explicit about the CAFE treatment of dedicated vehicles up to and beyond the 2019 model year (until Congress makes some changes). Through 2019 the dual fuel CNG-gas vehicle CAFE is a 50/50 weighting of the two fuels, where CNG gets to use the 0.15 divisor. After 2019 the dual fuel CNG-gas vehicle CAFE is a UF-weighting of the two fuels, where the CNG gets to use the 0.15 divisor. Dedicated CNG vehicles may use the 0.15 into eternity, barring Congressional action that changes this. So yes, after 2019 dedicated vehicles may continue to use the 0.15 divisor.

As far as there being no cap for CAFE under the UF approach, that's not quite correct. Through 2019 the approach must be the 50/50 average of the two fuels, and the cap applies. After 2019, on the CAFE side of the equation, the concept of a cap on credits disappears, and the UF-based approach takes over.

On the GHG side of the equation, dual fuel CNG-gas vehicles have a choice through 2015: use the 50/50 weighting and the 0.15 divisor, in which case the CAFE-equivalent cap applies; or use the UF-based approach (no 0.15 divisor), in which as the CAFE-equivalent cap does not apply.

Clear as mud, right?

Rob

Roberts W. French, Jr.
U.S. EPA Office of Transportation and Air Quality
Compliance and Innovative Strategies Division
2000 Traverwood Drive
Ann Arbor, MI 48105
Phone: 734.214.4380 Fax: 734.214.4869 Email: french.roberts@epa.gov

From: Peter Meier@ahm.honda.com
To: Roberts_French/AA/USEPA/US@EPA
Cc: Joel Dalton/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Darin_Johnson@ahm.honda.com
Date: 09/17/2012 08:33 PM
Subject: Honda - Natural Gas CAFE/GHG Calculation

Hi Rob,

I'm having a difficult time following how to calculate the CAFE mpg and GHG fleet (CREE) for both dedicated and dual fuel CNG in the 2012-2025 timeframe. Honda is seriously considering expanding our future CNG offerings, and I'm not able to confidently answer questions regarding fleet calculations. I'm hoping you can help me understand the intent. I think the rules for when we can use the utility factor approach on dual fuel CNG are clear. Where I get lost is when we can apply the 0.15 factor.

It seems for CREE this 0.15 factor is never applied after 2015 for either dedicated nor dual fuel. Is this correct?

For CAFE it appears there's a change after 2019MY, where only the UF approach (2X range, ect..) may use the 0.15 factor. I guess that means dedicate may continue to use the 0.15 factor for CAFE throughout the 2012-2025 timeframe. Is that right?

The utility factor approach seems not count as a credit, and therefore there is no cap for CAFE if using this method. Is that right?

Any advise you can give would be greatly appreciated.

Thank you,

Pete Meier, American Honda Certification
(310) 783-3424
cell (310) 972-1501

[attachment "GHG-CAFE alt fuel treatment v2.pdf" deleted by Peter Meier/AHM/AM/HONDA]

From: [Linc Wehrly](#)
To: [Roberts French](#)
Subject: Fw: Honda - EPA Meeting on October 23rd
Date: 10/22/2012 12:34 PM

Rob,

I know you will just be getting back, but this meeting is the same time as my weekly team meeting. Would it be possible for you to attend - just to hear their discussion on start/stop off-cycle credits?

Let me know if this would be a problem.

Thanks,
Linc

Linc Wehrly
Director, Light-Duty Vehicle Center
Compliance Division
United States Environmental Protection Agency
(734) 214-4286
wehrly.linc@epa.gov

----- Forwarded by Linc Wehrly/AA/USEPA/US on 10/22/2012 12:32 PM -----

From: William Charmley/AA/USEPA/US
To: Ed Nam/AA/USEPA/US@EPA, Robin Moran/AA/USEPA/US@EPA, Linc Wehrly/AA/USEPA/US@EPA, Brian Nelson/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA
Cc: Paul Machiele/AA/USEPA/US@EPA
Date: 10/22/2012 12:08 PM
Subject: Fw: Honda - EPA Meeting on October 23rd

Ed, Robin, Linc and Brian -

Paul has been working with Honda on a meeting to discuss some PM/fuels analysis for over a month, and we just learned on Friday that in addition to that topic, Honda wants to also discuss the following;

1. GHG Regulation - AC17 Testing (Tanabe), Off cycle credits for Start/Stop systems using a "Cool Storage" Evaporator (Errington)

this meeting starts at 10am on Tuesday (tomorrow), in C174.

Ed/Robin/Brian/Arvon - we will need some combination of the 4 of you for the first 30 minutes or so of the meeting to hear Honda's message on these GHG issues.

Linc - for the off-cycle credit discussion it would be good if someone from your group could participate.

thanks
Bill

----- Forwarded by William Charmley/AA/USEPA/US on 10/22/2012 12:05 PM -----

From: Robert_Bienenfeld@ahm.honda.com
To: Paul Machiele/AA/USEPA/US@EPA, William Charmley/AA/USEPA/US@EPA
Cc: JoNell Iffland/AA/USEPA/US@EPA
Date: 10/19/2012 06:36 PM
Subject: Honda - EPA Meeting on October 23rd

Paul, Bill:

The attendee list from Honda for our October 23rd meeting at your offices at 10am are:

Mr. Yuichiro Tanabe, R&D, Japan
Mr. Ayumu Matsuo, Honda R&D Americas (Los Angeles)
Mr. Jeff Jetter, Honda R&D Americas (Los Angeles)
Mr. Brad Errington, R&D Americas (Ohio)
Mr. Jim Erickson, R&D Americas (Ohio)
Mr. Robert Bienenfeld, American Honda Motor Co., PRO

Our final subjects are as follows:

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2. Tier III Regulations - Sulfur concerns (Tanabe), transition issues (Tier II to Tier III and LEV III to Tier III),
3. PM Index Discussion (Jetter)

We look forward to seeing you on Tuesday. rjb

Robert Bienenfeld
Senior Manager,
Environment and Energy Strategy
Product Regulatory Office
American Honda Motor Co., Inc.
310.783.3056 Office
310.948.2569 Mobile

From: [Roberts French](#)
To: [Linc Wehrly](#)
Subject: Re: Fw: Honda - EPA Meeting on October 23rd
Date: 10/23/2012 08:19 AM

I'd like to, but it will be close. I'm running my mom to the airport, and hope to be in at just about 10. If I can get on the way within the next half hour then it shouldn't be a problem.
Rob

Roberts W. French, Jr.
U.S. EPA Office of Transportation and Air Quality
Compliance and Innovative Strategies Division
2000 Traverwood Drive
Ann Arbor, MI 48105
Phone: 734.214.4380 Fax: 734.214.4869 Email: french.roberts@epa.gov

-----Linc Wehrly/AA/USEPA/US wrote: -----

To: Roberts French/AA/USEPA/US@EPA
From: Linc Wehrly/AA/USEPA/US
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From: [Roberts French](#)
To: [Linc Wehrly](#)
Subject: Re: Fw: Honda - EPA Meeting on October 23rd
Date: 10/23/2012 08:35 AM

Leaving now, so I think I should be able to make it.
Rob

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U.S. EPA Office of Transportation and Air Quality
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2000 Traverwood Drive
Ann Arbor, MI 48105
Phone: 734.214.4380 Fax: 734.214.4869 Email: french.roberts@epa.gov

-----Linc Wehrly/AA/USEPA/US wrote: -----

To: Roberts French/AA/USEPA/US@EPA
From: Linc Wehrly/AA/USEPA/US
Date: 10/22/2012 12:34PM
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wehrly.linc@epa.gov

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From: [Linc Wehrly](#)
To: [Roberts French](#)
Subject: Re: Fw: Honda - EPA Meeting on October 23rd
Date: 10/23/2012 08:45 AM

Thanks, Rob. Don't go crazy trying to make it. There will be people from ASD there, so if we can't make it, I don't think it's a big problem.

Linc Wehrly
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United States Environmental Protection Agency
(734) 214-4286
wehrly.linc@epa.gov

▼ Roberts French---10/23/2012 08:35:26 AM---Leaving now, so I think I should be able to make it. Rob -----

From: Roberts French/AA/USEPA/US
To: Linc Wehrly/AA/USEPA/US@EPA
Date: 10/23/2012 08:35 AM
Subject: Re: Fw: Honda - EPA Meeting on October 23rd

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From: [Ed Nam](#)
To: [Paul Machiele](#); [Kathryn Sargeant](#); [John Koupal](#); [Aron Butler](#); [Brian Nelson](#); [Arvon Mitcham](#); [Linc Wehrly](#); [Roberts French](#); [Robin Moran](#); [Byungho Lee](#); [Catherine Yanca](#); [Antonio Fernandez](#)
Cc: [William Charmley](#)
Subject: Fw: Today's Document
Date: 10/23/2012 02:56 PM
Attachments: [Honda EPA Meeting 121023.pdf](#)

Hi all,

below is Honda's presentation from today. Please remember that this is CBI.

-Ed

----- Forwarded by Ed Nam/AA/USEPA/US on 10/23/2012 02:54 PM -----

From: Robert_Bienenfeld@ahm.honda.com
To: William Charmley/AA/USEPA/US@EPA, Ed Nam/AA/USEPA/US@EPA, Paul Machiele/AA/USEPA/US@EPA, Kathryn Sargeant/AA/USEPA/US@EPA
Date: 10/23/2012 02:41 PM
Subject: Today's Document

Thank you for joining us for a very productive meeting, today. We really appreciate the opportunity to have these candid discussions. Here is our document from today.

Please forward to other EPA attendees, as appropriate:

(See attached file: Honda EPA Meeting 121023.pdf)

rjb

Robert Bienenfeld
Senior Manager,
Environment and Energy Strategy
Product Regulatory Office
American Honda Motor Co., Inc.



310.783.3056